## IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF NEW YORK

Esther Wilder,

Plaintiff,

Civ. Action No. 1:22-cv-01254-PKC

v.

Sarah Hoiland,

Defendant.

## DECLARATION OF JANET B. LINN, ESQ. IN SUPPORT OF PLAINTIFF'S MOTION FOR SUMMARY JUDGMENT

I, Janet B. Linn, declare as follows:

- 1. I am an attorney with the law firm of Tarter, Krinsky & Drogin LLP, counsel of record for Plaintiff Esther Wilder ("Plaintiff").
- 2. I make this Declaration in support of Plaintiff's motion for summary judgment based on my personal knowledge and my review of the documents annexed as exhibits hereto.
- 3. Attached hereto as **Exhibit 16** is a true and correct copy of a document produced by Defendant in this action with Bates numbers D0504–529.
- 4. Attached hereto as **Exhibit 17** is a true and correct copy of a document produced by Defendant in this action with Bates numbers D0001–03.
- 5. Attached hereto as **Exhibit 18** is a true and correct copy of a document produced by Defendant in this action with Bates numbers D0088–103.
- 6. Attached hereto as **Exhibit 19** is a true and correct copy of a printout of the webpage located at <a href="https://www.nsf.gov/awardsearch/showAward?AWD\_ID=1644948&HistoricalAwards">https://www.nsf.gov/awardsearch/showAward?AWD\_ID=1644948&HistoricalAwards</a> = false (i.e., the hyperlink included on Slide 2 (D0235) of a document produced by Defendant in

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this action with Bates numbers D0234-256), as of about December 9, 2022. This document was

marked as Exhibit 3 to the December 9, 2022, deposition of Defendant Sarah Hoiland

("Defendant") taken in this action.

7. Attached hereto as **Exhibit 20** is a true and correct copy of the transcript of the

December 9, 2022, deposition of Defendant, taken in this action.

I declare under penalty of perjury under the laws of the United States of America that the

foregoing is true and correct.

Dated: March 28, 2023

By: *s/Janet B .Linn* 

Janet B .Linn

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